



July 28, 2011

Mr. Jon Boyens
Senior Advisor, Computer Security Division
National Institute of Standards and Technology
100 Bureau Drive, Mail Stop 893
Gaithersburg, MD 20819

RE: Response to Cybersecurity, Innovation, and the Internet Economy Notice of Inquiry
(Docket No. 110527305-1303-02)

Dear Mr. Boyens:

The Information Technology Industry Council (ITI) respectfully requests a 3-week extension (until August 22) of the public comment period for the above-named Notice of Inquiry (NOI).

ITI is the premiere voice, advocate, and thought leader for the information and communications technology (ICT) industry. ITI's 50 members comprise the world's leading technology companies. As both producers and consumers of cybersecurity products and services, our members have extensive experience working with the U.S. Government—as well as governments around the world—on the critical issue of cybersecurity policy.

ITI commends the Department's Internet Policy Task Force for undertaking the challenging task of developing its "Green Paper," an initial proposal for "a new framework for addressing Internet security issues for companies outside of the orbit of critical infrastructure or key resources." While ITI and its members seek to provide useful and timely answers to the 47 questions included in the Green Paper, we believe more time is needed than currently allotted for us to provide such input to the range of serious questions that have significant consequences. Some key lines of questioning about which our members seek to spend more attention include the proposed definition of a new sector for non-covered infrastructure (the "I3S") and how that sector might be treated in contrast to owners and operators of CCI; if and how voluntary codes of conduct should be developed and promoted in the I3S space by the Department and if so, which ones; and how the Department can ensure cybersecurity standards and practices are global. We imagine other interested stakeholders might also desire more time to pose thoughtful answers to these challenging questions, and we believe if granted the additional time will allow the Department to receive the substantive input it desires.

We appreciate your consideration of our request to extend the comment period until August 22.

Sincerely,

Dean C. Garfield
President & CEO

Chair: Pamela Passman, Microsoft • Vice Chair: Peter Cleveland, Intel •

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• Rick Goss, Vice President for Environment and Sustainability